

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

October 06, 2021

Nathan Ochsner, Clerk of Court

United States of America  
v.  
Sha Kendrick Edward Smith

Case No.

4:21-mj-2139

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2021 to present in the county of Harris/Montgomery in the  
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 1591

Offense Description

Sex Trafficking of Minors

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature


SA Bethany Morris

Printed name and title

Sworn to before me telephonically.

Date: 10/06/2021

City and state: Houston, Texas



Judge's signature

U.S. Magistrate Judge Christina A. Bryan

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Bethany Morris, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent of the FBI since December 2012. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. During my assignment with the FBI, I have participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children. I have investigated multiple cases involving child pornography and the sexual exploitation of children. I have participated in various FBI mandated training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography as defined in Title 18, U.S.C. §2256. I have participated in numerous investigations and trainings related to Human Trafficking offenses.
2. This Affidavit is made in support of a criminal complaint charging Sha Kendrick Edward Smith (Smith), with violating 18 U.S.C. §1591, which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing or in reckless disregard of the fact that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.
3. I am familiar with the information contained in the Affidavit based upon the investigation that myself and other law enforcement officers have conducted, and any of my conversations with other parties involved in this case.

4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of Title 18, U.S.C. §1591 has been committed by Smith starting from September 2021 through October 2021. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. Your Affiant learned the following from Houston Independent School District, Minor Victim<sup>1</sup> (MV), Date of Birth 10/10/2007, ran away and was believed to be with a pimp named Kendrick, who was it was believed was causing MV to engage in commercial sex.
6. Your Affiant learned the following from a Department of Family Protective Services (DFPS) Special Investigator:
  - a. MV was previously reported as a runaway on September 8, 2021, and returned to MV's residential facility on September 20, 2021, with a phone in MV's possession that MV indicated had been given to MV by MV's pimp, known at the time only as Kendrick. The facility contacted Houston Police Department (HPD) and MV was taken to Texas Children's Hospital for a SANE exam. HPD retained MV's phone as evidence.
  - b. MV was returned to MV's residential facility and ran away again on September 21, 2021.
  - c. Between September 8, 2021, and September 20, 2021, while in runaway status, MV communicated with a Court Appointed Special Advocate

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<sup>1</sup> MV's identity is known to law enforcement but is not being disclosed in this document because MV is a minor.

(CASA) via the phone given to MV by Kendrick. During MV's conversation with the CASA, MV stated that Kendrick had caused MV to engage in commercial sex. MV stated that MV and Kendrick had sexual relations. MV stated that they were in the Houston area, describing some surroundings. MV reported Kendrick was on parole and it appeared to MV that he was well known around the neighborhood where they were staying. Kendrick lives with his mother and took MV to a nearby trailer park where MV engaged in commercial sex. MV reported Kendrick always carries a gun. MV reported that Kendrick is 21 years old and MV lied to Kendrick claiming that MV was 18 years old. MV provided proof of life photos to the CASA via text messages.

- d. MV told the CASA that MV was allowed to be in Kendrick's mother's residence during the day but was not allowed to sleep inside, therefore MV slept in the car in the driveway of the residence.

7. Your Affiant learned from an HPD police report that MV stated that MV met Kendrick after running away on September 8, 2021, and Kendrick offered to help MV make some money by engaging in commercial sex. Kendrick took MV to multiple locations including a trailer park in the Woodlands. MV engaged in commercial sex with approximately eight men over 12 days. Kendrick charged each man \$70.00-\$100.00 to engage in commercial sex with MV. Kendrick gave MV the black Samsung cell phone which was recovered by HPD on September 20, 2021. At the time the phone was recovered, MV gave HPD the password for the phone, which was provided to Your Affiant.

8. Pursuant to a search warrant signed in the Southern District of Texas, Your Affiant conducted a search of the black Samsung cell phone and located the following:
  - a. Text messages between MV and the CASA.
  - b. A photo of an unknown black male set as the background photo.
  - c. Multiple photos of MV in front a residence.
  - d. The Snapchat handle ixey55 in a chat conversation.
9. Your Affiant submitted an exigent request to Snapchat related to the ixey55 Snapchat handle. Snapchat responded to the exigent request with the following information:
  - a. Display name: Kendrick Smith
  - b. Phone number: 346-375-2180
10. Your Affiant learned through an open source search that the phone number belonged to Edwina Letrice Miller (Miller) with a last known address shown on 9630 Bimms Drive, Conroe, Texas. A search of possible relatives for Miller disclosed a possible son, Smith, Date of Birth 9/28/1999, with a last known address shown as 9630 Bimms Drive, Conroe, Texas.
11. Your Affiant believes that the male in the photo, set as the background of MV's cell phone, is Smith, based on a review of Smith's Texas driver license.
12. During the execution of a federal search warrant at 9630 Bimms Drive, Conroe, Texas, Your Affiant learned through an interview of Miller that MV had been at the residence with Smith for approximately four days. The last time Miller saw MV was when her fiancé, Jeffrey Haywood (Haywood) drove MV to an area of Northeast Houston, Texas on an unknown date and left her in a parking lot.



13. Your Affiant learned through an interview with Shanacy Miller, Smith's sister, that MV was at the residence with Smith for approximately five days, during which time, Shanacy Miller knew that MV was engaging in commercial sex. Shanacy Miller did not know MV's exact age but believed that she was under the age of 18. The last time Shanacy Miller saw MV was when Haywood drove MV to an area of Northeast Houston, Texas on an unknown date and left her in a parking lot.

**CONCLUSION**

14. Based upon the information set forth above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Smith with violation of 18 U.S.C. §1591, which makes it a crime for someone who benefits financially, or by receiving anything of value, knowing, or in reckless disregard of the fact the person will be caused to engage in a commercial sex act and the person has not attained the age of 18 years.



Bethany Morris

Special Agent

Signed and sworn to before me telephonically this the 6<sup>th</sup> day of October, 2021 and I find probable cause.



Christina A. Bryan

United States Magistrate Judge